

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR DRAFT PERMIT NO. F-05-019

TG Automotive Sealing Kentucky, LLC.

501 Frank Yost Lane Hopkinsville, KY 42240

JULY 9, 2005

FROUGH SHERWANI, REVIEWER

PLANT I.D. #: 021-047-00108

AI #: 4417

Activity Number: APE20050003

**SOURCE PROCESS DESCRIPTION:**

TG Automotive Sealing Kentucky, LLC is located in Hopkinsville, Kentucky. The facility manufactures a variety of automotive sealing products. These products are used for sealing doors, trunk lids, engine hoods, window sealant products and other automotive applications.

The facility is currently operating under the authority of 401 KAR 52:070; Registration of Designated Sources. On March 15, 2005, the source applied to construct six (6) new extrusion lines. The resulting VOC/HAPS potential to emit are greater than major source thresholds. The source opted to take federally enforceable limits to preclude the applicability of Title V.

**Existing Source:**

**Emission Point: 01 (Line # A1)**

MP1: MRC Coating/AIC Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 02 (Line # A2)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 03 (Line # A3)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

MP3: Infrared Preheat

MP4: Curing Heat

**Emission Point: 04 (Line # A4)**

MP1: Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 05 (Line # A5)**

MP1: MRC Coating/AIC Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 06 (Line # A6)**

MP1: Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Points: 13 (N.G. Consumption)**

MP1-MP10: (10 Heaters, @ 0.2 MBTU/hr each)

MP14-MP16: (3 Air Make Up units, @ 1.282 MBTU/hr each)

MP20: (One Office AMU, @ 0.08 MBTU/hr)

**Emission Points: 15 (Finishing # 1)**

MP1: Finishing

**Emission Points: 16 (Off Line Coating# 2)**

MP1: Coater

MP2: Ransburg Oven # 1(0.794 MBTU/hr each, N.G.)

**Proposed Construction:**

**Emission Point: 07 (Line # A7)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 08 (Line # A8)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 09 (Line # A9)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 11 (Line # A11)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Point: 12 (Line # A12)**

MP1: Coating

MP2: Rubber Curing/Vulcanization (@ 0.198 MBTU/hr, N.G.)

**Emission Points: 14 (N.G. Consumption)**

MP11-MP13: (3 Heaters, @ 0.2 MBTU/hr each)

MP17-MP19: (3 Air Make Up units, @ 1.282 MBTU/hr each)

**Emission Points: 15 (Finishing # 2)**

MP2: Finishing

**Emission Points: 16 (Off Line Coating # 2)**

MP3: Coater

MP4: Ransburg Oven # 2(0.794 MBTU/hr each, N.G.)

**Emission Point: 17 (Extruders)**

MP1: Total 33 Extruders

**COMMENTS:**

**Emission factors and their source:**

AP – 42 5<sup>th</sup> edition, and mass balance (MSDS) are used for the emission factors for PM, VOC and HAPS.

**Applicable regulation:**

- 1 **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility, which emits or may emit potentially hazardous matter or toxic substances.
- 2 **401 KAR 52:030**; Federally enforceable permits for non-major sources.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

**PERIODIC MONITORING:**

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 months emission limitations.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.